

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

<b>IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION</b>	§ § § § § § § §	<b>No. 1:19-md-2875-RBK</b> <b>Hon. Robert Kugler</b>
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**PLAINTIFFS' RESPONSE TO SPECIAL MASTER ORDER NO. 46  
RE: SHOW-CAUSE DEADLINE**

On October 8, 2021, the Special Master issued his report and Special Master Order No. 46 on Plaintiffs' motion for leave to amend the master complaints. *See ECF 1614 (Report) & ECF 1615 (Order).* That Order directed Plaintiffs to show cause, by October 28, 2021, as to why certain entities should not be dismissed from the Master Economic Loss and Master Medical Monitoring Complaints. *See ECF 1615 at ¶ 11.*

Plaintiffs present herewith that two Torrent entities – Torrent Pharmaceuticals, Ltd. and Torrent Pharma, Inc. – should not be dismissed from the Master Economic Loss Complaint.<sup>1</sup> In support of this request, Plaintiffs state as follows:

1. Plaintiffs have conferred with counsel for both Torrent entities at issue here, Torrent Pharmaceuticals Ltd. and Torrent Pharma, Inc., in connection with this response to Order No. 46.
2. In the Manufacturer Defendants' Opposition to Plaintiffs' Motion for Leave to Amend Master Complaints, neither Torrent entity sought to be dismissed from the Master Economic Loss Complaint on the basis that Plaintiffs had not traced any injury to a specific

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<sup>1</sup> Special Master Order No. 46 does not take issue with any Torrent entity's being named in the Master Personal Injury Complaint.

Torrent entity. *See* ECF 1277 at 12; ECF 1277-1 at 3 (no Torrent entity listed). They only sought dismissal from the Master Medical Monitoring Complaint on this basis. *See* ECF 1277 at 12; ECF 1277-1 at 4 (listing Torrent Pharma, Inc. and Torrent Pharmaceuticals, Ltd.).

3. Thus, Plaintiffs contend it is proper to include the Torrent entities identified above in the forthcoming amended Master Economic Loss Complaint due to be filed on November 1, 2021.
4. Plaintiffs do not take issue with any Torrent entity's removal from the Master Medical Monitoring Complaint, and will be removing any Torrent entity from the forthcoming amended Master Medical Monitoring Complaint due to be filed on November 1, 2021.

WHEREFORE, Plaintiffs respectfully request that Defendants Torrent Pharmaceuticals, Ltd. and Torrent Pharma, Inc. not be dismissed from the Master Economic Loss Complaint.

Dated: October 28, 2021

Respectfully submitted,

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/s/ *Ruben Honik*

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*/s/ Adam Slater*

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***MDL Plaintiffs' Co-Lead Counsel***

**CERTIFICATE OF SERVICE**

I hereby aver that on October 28, 2021, a true and correct copy of the foregoing was filed and served upon all counsel of record by operation of the court's CM/ECF system.

*/s/ David J. Stanoch*  
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David J. Stanoch